

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the matter of:

United States of America	:	Case No.: 2:23-mj-516
v.	:	
Jack Eugene Moore	:	
1111 Mediterranean Avenue, Apt 203	:	Magistrate Judge: Vascura
Columbus, Ohio 43229	:	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Josh Saltar (Your Affiant), a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

1. I, Special Agent Josh Saltar (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b) – advertising/solicitation for/or, and distribution and receipt of visual depictions of minors engaged in sexually explicit conduct (hereinafter “child pornography”), distribution, transmission, receipt, and/or possession of child pornography, as well as and the coercion or enticement of a minor(s). Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Jack Eugene Moore (MOORE) committed the violations listed above.
2. I am a Special Agent (SA) with the Federal Bureau of Investigations (FBI) and have been since October 2014. I am currently assigned to the Child Exploitation and Human Trafficking Task Force, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have worked with multiple international law enforcement agencies around the world, focusing on cyber-terrorism and terrorist financing through computer intrusions. I have also assisted on various cases and violations, ranging from violent crimes against children and white collar to healthcare fraud, counterintelligence, and counterterrorism. As part of my duties as a Special Agent, I investigate criminal violations relating to child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252,

and 2252A. I have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Prior to joining the FBI, I spent four years working as a civilian Intelligence Specialist for the U.S. Air Force at the National Air and Space Intelligence Center located at the Wright-Patterson Air Force Base, under both the cyber and counterspace squadrons, performing classified intel and reverse engineering duties. During my employment, I have received numerous forensic trainings with the both the Department of Defense and Department of Justice, as well as from private sector security conferences. I have received multiple certifications in Windows, mobile, and memory forensics, as well as incident response and penetration testing, and am certified by the Department of Justice as a Digital Extraction Technician. I received my B.A. from Anderson University in computer science, with a focus on programming, artificial intelligence, and machine learning. As a SA with the FBI, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

31. On or about July 13, 2023, an FBI Special Agent with the El Paso Field Office was working in an undercover capacity (OCE) attempting to identify subjects involved in the online sexual exploitation of children. On this date, the OCE was utilizing the social media application Whisper. While on the app, the OCE began communication with a Whisper member utilizing username Net_Twin. At the time, the OCE was posing as a thirteen-year-old female named Jesse. During communications between the Net_Twin and OCE on the Whisper app, the following exchange occurred:

Net_Twin:	Age?
Net_Twin:	M of f
OCE:	cool cool
OCE:	f
OCE:	u?
Net_Twin:	M
OCE:	how old r u
OCE:	wait wym
Net_Twin:	15
Net_Twin:	You?
OCE:	13
Net_Twin:	Big up top?
Net_Twin:	May I see?
OCE:	no
Net_Twin:	Size?
OCE:	i dont wanna send nudes

OCE:	my messages are getting all mixed up
OCE:	u want to kik or text
Net_Twin:	6148027176

32. At that point, the OCE and the individual utilizing the Net_Twin account began communicating via text message. The following messages were exchanged over text between the phone number (614) 802-7176, who the investigation revealed later to be Jack Eugene Moore III (MOORE) and the OCE beginning on or about July 13, 2023:

MOORE: **Jesse? It's Jack.**

OCE: what do u look like

MOORE: **5'4"black hair green eyes and 125lbs.**

MOORE: **You've seen My cock.**

MOORE: **May I see your breasts, please?**

OCE: i like ur suspenders 😊

MOORE: **unzips My jeans Thank you.**

OCE: tell me how old u r n ill think about it

OCE: im nervous to do that tho frl

MOORE: **I'm 22. :(No need to be nervous. It's just us.**

OCE: u look 22 not 15

MOORE: **Do you really like what you see?**

OCE: Idk i just got burned before w nudes

OCE: i think ur rly cute!

MOORE: **Please, Jesse?**

MOORE: **rubbing your belly softly and gently**

OCE: idk

OCE: ill think abiut it

MOORE: **Where do you want Me to cum?**

OCE: wym where

MOORE: **Talk dirty to Me.**

OCE: where u want to

OCE: ?

MOORE: **Inside you.**

OCE: u want to?

OCE: ok

MOORE: **Help Me, Babygirl.**

MOORE: **Tell Me what you want Me to do.**

OCE: what should i do

MOORE: **Take a pic of your boobs and/or pussy for Me.**

MOORE: **Can Daddy see?**

OCE: yea daddy

OCE: my phone is about to go off
MOORE: **Pics first? :(**
OCE: i dont want to send nudes babe
OCE: ill think about it
MOORE: **Bra and panties then?**

33. The conversation between MOORE and the OCE continued over text message the next day on or about July 14, 2023 and the following are excerpts from that exchange:

OCE: hey
MOORE: **How's you, cutie?**
OCE: doin ok
MOORE: **Did you take the bra and panties pics I asked for?**
OCE: no
MOORE: **Do you want to?**
MOORE: **I mean, you like My cock, right?**
OCE: i didnt want to

MOORE: **Rub your clit for Me. Let Me know how it feels.**
OCE: i dont like it but i dont have a razor
MOORE: **Don't shave it.**
OCE: ive heard of that but how do i know where
MOORE: **You know between your pussy lips there's little bud?**
OCE: a bud?
OCE: wym
MOORE: **You know between the lips, near the top?**
OCE: on the inside?
MOORE: **Nods**
OCE: ?
MOORE: **Rub it.**
MOORE: **Let Me know how it feels.**
MOORE: **You like that?**
OCE: what is nods
MOORE: **Nodding My head in agreement.**
OCE: i guess
MOORE: **But are you rubbing it?**
OCE: ok
OCE: yea but then what
MOORE: **Are you getting wet?**
OCE: no
OCE: i dont think so
MOORE: **Where are you rubbing?**
OCE: my inside
MOORE: **Where inside?**

MOORE: Like inside the hole?
OCE: yea ofc
OCE: what u doin tonight
MOORE: Just above the hole, that's where I want you to rub.
MOORE: Let Daddy know when you are.
OCE: ok
MOORE: How's it feel now?
OCE: same
OCE: do u talk w alot of girls
MOORE: No.
OCE: ok
MOORE: Um...okay. Tell you what, take a pic of it for Daddy
and I'll try to show you where I mean.
OCE: no

34. The conversation between MOORE and the OCE continued into the next day, on or about July 15, 2023, during which, MOORE requested the OCE send him a pair of the OCE's panties. The following is an excerpt from that exchange:

MOORE: Can you do something for Daddy?
OCE: ok
MOORE: If I give you My address, would you send Me a pair of
your panties?
OCE: yea
MOORE: Have I shocked you?
OCE: like ones i wear
MOORE: You'd send Me a pair?
MOORE: Yes.
OCE: sure

OCE: whats ur addy
MOORE: You like the idea of Daddy using your panties to beat
off?
MOORE: 1111 Mediterranean Ave Apt 203 Columbus, Ohio
43229 (the SUBJECT PREMISES)

35. In a conversation occurring via text message on or about July 17, 2023, the OCE asked MOORE if he normally talked with "girls [her] age" and in response, MOORE said he did not. The OCE then verified the age of his person stating "a lot of guys stop talkin to me when i tell em im 13" to which MOORE responded, "Wonder why that is."
36. Communications between the OCE and MOORE continued on through July and on July 24, 2023, MOORE reached out to the OCE asking about the panties the OCE had promised to mail him as noted in the conversation above. The following is an excerpt from that conversation:

MOORE: Update on the little package?
OCE: so do i just mail it to that address you gave me
MOORE: What's the color of the day panties wise,?
OCE: like who do i mail it to
MOORE: Yup.
OCE: just put jack or what
MOORE: You have My full name, right?
OCE: no u just said jack
MOORE: Jack E Moore III (the SUBJECT PERSON)
OCE: ok
OCE: who else lives there though
OCE: what if they open it
OCE: Id be so embarrassed
MOORE: They won't open it.
OCE: how do u know tho
OCE: [frowning emoji]
MOORE: It's an apartment building, Baby. And I know that
because of they try to open Mysil, it's a federal offense.
MOORE: My mail*


37. On July 17, 2023, after learning that the (614) 802-7176 telephone number was resolved to Verizon Wireless, the FBI El Paso served an administrative subpoena to Verizon Wireless for information related to the subscriber. On July 26, 2023, Verizon Wireless responded to the subpoena and provided the following information:

Last Name: MOOREBRADLEY
First Name: JACK

38. In addition, on or about July 17, 2023, when the OCE asked MOORE if MOORE “was gonna send [the OCE] a pic of [MOORE]”, MOORE responded by stating “I have?” and followed up by sending a photo and stating, “But there’s a new one.” FBI El Paso compared that image to the image from the Ohio Bureau of Motor Vehicles database for Jack MOORE and identified him as the same person from the image sent to the OCE.
39. On or about August 30, 2023, pursuant to the conversation between the OCE and MOORE, the FBI El Paso sent MOORE, via USPS mail, a pair of children’s underwear. The parcel was sent to the SUBJECT PREMISES and addressed to the SUBJECT PERSON. On or about September 1, 2023, USPS confirmed delivery to the SUBJECT PREMISES via a tracking receipt.
40. After the OCE was notified via USPS that the parcel containing the children’s underwear was delivered to the SUBJECT PRESISES, MOORE sent a picture of the underwear he received to the OCE via text message, confirming receipt of that underwear by him.

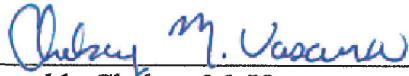
41. Further investigation into Jack MOORE revealed that he was a convicted sex offender with prior failure to register convictions. More specifically, MOORE had been arrested on July 1, 1998 and charged in Montgomery County, Ohio with Corruption of a Minor in violation of Ohio Revised Code Section 2907.04A under case number 1998 CR 02268. MOORE pled guilty to that charge, a felony in the fourth degree, on August 4, 1998 and was sentenced to twelve months incarceration on September 4, 1998.
42. As a result of that conviction, MOORE was required to register as sex offender and failed to comply with his obligations as such. Law enforcement learned that MOORE had additional failures to register and/or failures to provide updated information to registry convictions as noted:
 - a. On May 29, 2002, MOORE plead guilty in the Clermont, Ohio Court of Common Pleas to Failure to Notify of Change in Address in violation of Ohio Revised Code Section 2950.05(E)(1), a felony in the fifth degree. MOORE was sentenced on May 21, 2002 to twelve months of probation in the matter under case number 2002 CR 000128.
 - b. On August 11, 2006, MOORE pled guilty in the Black Hawk, Iowa Municipal Court to Failure to Register as a Sex Offender and Violation of the Sex Offender Registry by Living within 2,000 feet of a School in violation of Iowa Code Sections 692A.7(1)-A and 69A.2A(3) respectively. MOORE was sentenced to five years imprisonment under case number 01071 FECR139247 on August 11, 2006.
 - c. On August 20, 2013, MOORE plead guilty in the Montgomery, Ohio Court of Common Pleas to Failure to Notify Change in Sex Offender Registry in violation of Ohio Revised Code Section 2950.05(A), a felony in the fourth degree. MOORE was sentenced on August 20, 2013 to five years of community control under case number 2013-CRA-006399.
43. Based upon the foregoing, your affiant submits that there is probable cause to believe that Jack MOORE has committed the violations of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b) – advertising/solicitation for/or, and distribution and receipt of visual depictions of minors engaged in sexually explicit conduct (hereinafter “child pornography”), distribution, transmission, receipt, and/or possession of child pornography, as well as and the coercion or enticement of a minor(s). Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

Respectfully submitted,



Josh Saltar
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on September 18, 2023



Honorable Chelsey M. Vascara
United States Magistrate Judge
United States District Court
Southern District of Ohio